



PORT GAMBLE S'KLALLAM TRIBE
NATURAL RESOURCES DEPARTMENT
31912 Little Boston Rd. NE – Kingston, WA 98346

February 1, 2012

Puget Sound Partnership
326 E D Street
Tacoma, WA 98421

To Whom It May Concern:

Thank you for the opportunity to review and comment on the Draft Action Agenda Update. The Port Gamble S'Klallam Tribe provides the following comments.

Section	Page	Comment
Hood Canal Profile (21F)	304	<p>Please correct the Hood Canal Action Area map to include the Port Gamble S'Klallam Tribe's reservation. The existing map in the Draft Action Agenda Update incorrectly identifies the area as "Federal, State, Local publically owned land".</p> <p>See the Port Gamble S'Klallam Tribe website for a map of the Reservation area: http://www.pgst.nsn.us/contact-info-a-directions</p>
Hood Canal Profile (21F)	307 - 310	<p>The priority strategies in the 2009 Action Agenda Hood Canal Profile included "prioritize inwater and upland toxic cleanup sites: Clean up industrial pollution in Port Gamble Bay." However, this action has been dropped from the 2011 Draft Action Agenda Update.</p> <p>The Hood Canal Opportunities, Priorities and Near Term Actions section of the Action Agenda Update should continue to include the Port Gamble Bay cleanup as a priority near term action. Under the State's Model Toxics Control Act (MTCA), Port Gamble Bay is a priority cleanup site under the Puget Sound Initiative. The Washington Department of Ecology is currently developing a MTCA cleanup plan for the site. http://www.ecy.wa.gov/programs/tcp/sites_brochure/psi/overview/psi_baywide.html</p>
Hood Canal Profile (21F)	307 - 310	<p>The Hood Canal Opportunities, Priorities and Near Term Actions should more explicitly identify the North Kitsap Forest and Bay conservation project as a near term strategy.</p> <p>We suggest the following language: "Forterra, working on behalf of Kitsap County, the Port Gamble S'Klallam Tribe and the Suquamish Tribe, will coordinate funding and agency participation to secure the conservation of land near Port Gamble bay, including almost 2 miles of shoreline within the next 30 months."</p> <p>This near term action will permanently protect water quality and nearshore habitat in Port Gamble Bay, as well as protect larger tracts of forests from conversion to residential development.</p>



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Recovery Target – Pacific herring	7	Please add 2,000 tons of Port Gamble Bay herring stock to the recovery targets for Pacific herring, along with the listed targets for Cherry Point and Squaxin Pass herring stocks. Port Gamble Bay contains one of the largest herring spawning habitats in the Puget Sound, where herring stocks averaged 2,176 tons between 1977 and 1997, but have declined significantly since that time. Port Gamble Bay stock should be added to all sections of the Draft Action Agenda Update where the recovery targets for herring are discussed.
Regional Near-Term Actions A1.2 NTA A1.3 NTA A2.1 NTA 5 Focus Land Development Away from Ecologically Important and Sensitive Areas	38	<p>We support the near-term actions that enable local governments to update land development and growth policies consistent with protection and recovery targets, particularly the protection of shoreline areas from activities that may harm nearshore habitats. We urge Ecology and Commerce to provide increased oversight and direction to local areas for these actions.</p> <p>We appreciate the inclusion of A2.1 Near-Term Action 5, which calls for Forterra to coordinate the permanent protection of lands near Port Gamble Bay, including the shoreline, within the next 30 months. The local Shoreline Master Plan Update should be consistent with both this A2.1 – 5 Near-Term Action, as well the MTCA cleanup actions underway in Port Gamble Bay.</p> <p>Shoreline Master Plan designations should reinforce restoration and protection plans, and not detract from near term progress and long-term protection. Shoreline designation planning for Port Gamble Bay, now underway, is one example of potentially inconsistent land use actions at local and state levels.</p> <p>Suggested language under A1.2 NTA: Where local planning is inconsistent with Puget Sound recovery strategies, and/or the Action Agenda, Ecology or Commerce will provide oversight and direction to local governments as needed.</p>
B4. Protect, Support Economic Viability of Working Waterfronts	141-144	<p>We support actions to improve environmental protection at marinas and working waterfronts through marine spatial planning. In addition to environmental protection, waterfront planning should protect cultural and tribal resources in those areas. For example, tribal resources and culturally sensitive areas near Port Gamble Bay are in direct conflict with local industrial and development activities and plans.</p> <p>In addition, marine spatial planning should be consistent with MTCA cleanup actions and other federal, state, tribal, and local environmental protection and restoration programs underway.</p>



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C1.1 C1.5 NTA 1 Reduce the Sources of Toxic Chemicals in Puget Sound	166 - 177	<p>While we understand and agree with the importance of addressing nonpoint source pollution in principle, as in C1.1, the Draft Action Agenda Update does not go far enough to address the point source problem at a regional scale.</p> <p>A People for Puget Sound study of point source discharges showed that vast amounts of chemicals, oils and grease are being discharged every minute of every day into the Puget Sound from permitted point source discharges, including industry and municipal treatment plants. Point source issues would be addressed more effectively through revised permit requirements, stricter permit conditions and enforcement, studies of new treatment and filtration technologies, and associated education and outreach. We encourage the Puget Sound Partnership to include these strategies for addressing point source pollution in Puget Sound.</p>
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Thank you for your consideration of these comments. Please contact us with any questions (360-297-6265).

Sincerely,

Roma Call
Environmental Coordinator
Port Gamble S'Klallam Tribe
Natural Resources Department